

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
	(Def. MSJ Exh. 24);			
P-5	May 9, 2018 Letter To FFA Parents from D. Shapiro (Def. MSJ Exh. 25);			
P-6	April 10, 2018 FFA Alumni Board Meeting (Def. MSJ Exh. 26);			
P-7	Spring 2018 emails (Reeves, Hendrix, Robinson) “cultural awareness” (AISD 464-465) (Def. MSJ Exh. 27);			
P-8	April 2018, Emails From Mrs. Parks-Sneed To Dr. Cruz (racial bullying) (Def. MSJ Exh. 28);			
P-9	April 2018, Emails from Jacob Reach Re: Meeting (Def. MSJ Exh. 29);			
P-10	April 2018, Emails To/From Robinson re: FFA conduct at banquet (Def. MSJ Exh. 30);			
P-11	April 2018 emails with Rosa Palacios (AISD Exec. Asst. to Dr. Cruz) (Sneed 133-141)			
P-12	May 2018 emails with Jacob Reach (AISD) (Sneed 206)			
P-13	May 2018 emails to Mr. Robinson (Sneed 230-231)			
P-14	May 2018 emails with Rosa Palacios, Dr. Shapiro, Mark Robinson (Sneed 327-242)			
P-15	May 2018 emails with Rosa Palacios (Sneed 286-288)			
P-16	May 23, 2018 email to Robinson/Shapiro (racism “norm”) (AISD 078 – 082).			
P-17	October 2018 emails re: Yasmin Wagner (AISD Board of Trustees) (AISD 021-24)			
P-18	Sass-quatch Award (Def. MSJ Ex. 13);			
P-19	DWQ Better Path Counseling and Consulting, PLLC (treatment records) (redacted)			
P-20	DWQ Better Path Counseling and Consulting, PLLC (billing records)(redacted)			
P-21	DWQ Glasshouse Effect Psychotherapy (treatment records)(redacted)			
P-22	DWQ Glasshouse Effect Psychotherapy (billing			

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	records)(redacted)			
P-23	School Board Policy FFH (REGULATION) FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (D MSJ Ex. 8, Pl. Ex. D);			
P-24	School Board Policy FFH (LEGAL); FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (Pl. Exh. B);			
P-25	School Board Policy FFH (LOCAL); FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (Pl. Exh. C);			
P-26	School Board Policy FFH (EXHIBIT); FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (Pl. Exh. E);			
P-27	<i>Dear Colleague Letter</i> , U.S. Department of Education, <i>Office of Civil Rights</i> (July 25, 2000).			
P-28	<i>Dear Colleague Letter</i> , U.S. Department of Education, <i>Office Of Civil Rights</i> (October 26, 2010);			
P-29	Clarifying Letter from US Department of Education (October 26, 2010);			
P-30	Guiding Principles- <i>A Resource Guide For Improving School Climate And Discipline</i> , U.S. Department of Education, January 2014;			
P-31	Department of Education, Racial Incidents and Harassment Against Students at Educational Institutions, 59 Fed. Reg. 11448 (1994).			
P-32	Guidelines On Bullying, Texas Association Of School Boards (2008);			
P-33	Guidelines On Bullying, Texas Association Of School Boards (2012);			
	II. PLAINTIFF MAY OFFER			
P-34	Dr. Craig Shapiro Deposition (D MSJ Ex. 6);			
P-35	Dr. Cruz Deposition (Pl. Supp., Exh. 1);			

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P-36	Camryn Sneed Deposition (D MSJ Ex. 1);			
P-37	Charles Sneed Deposition (D MSJ Ex. 2);			
P-38	Pamela-Parker Sneed Deposition (D MSJ Ex. 3);			
P-39	Mark Robinson Deposition (D MSJ Ex. 4);			
P-40	Susan Leos Deposition (D MSJ Ex. 5);			
P-41	Mark Robinson, Declaration (D MSJ Ex. 7);			
P-42	Susan Leos Declaration (D MSJ Ex. 10);			
P-43	Oct. 2017 Police Report (Def. MSJ Ex. 20);			
P-44	Officer Stephanie Kirkov, Declaration (Def. MSJ Ex. 14);			
P-45	Amber Dickinson, Declaration (Def. MSJ Ex. 17);			
P-46	Shelby Stephens, Declaration (Def. MSJ Ex. 18);			
P-47	Oct. 2017 Farm Concerns (Def. MSJ Ex. 19);			
P-48	May 4, 2018, Meeting To Discuss FFA (Def. MSJ Exh. 31);			
P-49	5/22/18 Summary of Incident (De La Rosa to Robinson) (Def. MSJ Exh. 32)			
P-50	September 15, 2018 APD Report about criminal mischief on farm (Def. MSJ Exh. 35);			
P-51	Follow Up Emails on APD Report (Def. MSJ Exh. 36);			
P-52	Emails To Kylee Rhorer on farm incident (Def. MSJ Exh. 37);			
P-53	Emails re: Kylee Rhorer on farm incident (Def. MSJ Exh. 38);			
P-54	Oct. 22, 2018 emails from Officer Kirkov on farm incidents (Def. MSJ Exh. 39);			
P-55	DWQ South Austin Medical Clinic (treatment records)			
P-56	December 2016 emails with Leos/Shapiro (Sneed 9-13)			
P-57	October 2017 emails with Robinson (Sneed 56-60)			
P-58	October 2017 emails with Leos/Shapiro (Sneed 74-77)			
P-59	April 2018 emails with Traci Hendrix (AISD CTE Coordinator) (Sneed 116-120)			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
P-60	May 2018 emails with Mr. Robinson (Sneed 255-258)			
P-61	10/25/17 Meeting with Mr. Robinson (Sneed 394-396)			
P-62	List of Ag problems including “racial slurs” (Sneed 401)			
P-63	(AISD 967) – Diagram of James Bowie High School			
P-64	Camron’s education file (AISD production)			
P-65	Plaintiff reserves the right to introduce any portion of documents produced in Discovery/Disclosure by the parties			
P-66	Plaintiff reserves the right to introduce other exhibits for purposes of cross examination and/or impeachment.			

Respectfully submitted,

/s/ ANTHONY O’HANLON

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CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2020, I hereby certify that a true and correct copy of the above and foregoing document has been electronically served on all counsel of record.

/s/ Anthony O'Hanlon
Anthony O'Hanlon